

DAHIYA LAW OFFICES LLC

*Attorneys*

75 Maiden Lane Suite 506  
New York, New York 10038  
Tel: 212-766 8000 Fax: 212 766 8001  
karam@legalpundit.com

January 15, 2016

Hon. Elizabeth S. Stong  
United States Bankruptcy Court  
EDNY  
271 Cadman Plaza East  
Brooklyn, NY 11201

Case Name: Geltzer v. Briznova, *et.al.*  
Case Number: Adv. Po. 15-01073

Respected Judge Stong:

I am the counsel for the defendants, Estella Briznova & Edward Soshkin in the subject matter proceeding and now writing to request an adjournment of the sanctions motion by Robert L. Geltzer.

The undersigned moved for a motion under Rule 12 (b) for dismissal of Geltzer's adversary complaint. The motion for dismissal came up for hearing after adjournment sought by Geltzer's special counsel Robert Wolf. The Court adjourned the hearing. The hearing has been adjourned to January 19, 2016 at 3:00 PM. Meanwhile, the plaintiff, Mr. Geltzer personally moved for sanctions and contempt of court invoking 11 U.S.C. § 105. This motion was filed purposefully, I believe on auspicious December 31, 2015, while I was out of United States. I came back last week and have to attend to some works and thus ran short of time to prepare an adequate response to this motion.

This motion for sanctions needs very adequate response, therefore I request two weeks time to file the same, i.e. by January 31st, 2016 and it be heard mid February, 2016. I will personally argue the sanctions motion. I did request Mr. Geltzer for time, he has not responded [Motion is not filed by the main litigation counsel, Robert Wolf]. Further, we are prepared to argue the motion for dismissal of the case on 19th January, 2016 itself. This motion for sanctions does not deal with the merit of the Rule 12 (b) relief, wherefore, there is no prejudice to anyone, if it is adjourned.

Yours faithfully,

/s/karamvir dahiya

Karamvir Dahiya for Defs.

cc: rgeltzer@epitrustee.com  
mbruh@geltzerlaw.com

**Based on the entire record, the time to respond to the Trustee's motion for sanctions is extended to January 31, 2016, at 4:00 PM.**  
**It is SO ORDERED.**



Dated: Brooklyn, New York  
January 15, 2016

  
Elizabeth S. Stong  
United States Bankruptcy Judge